

File No. 1694-31

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

|                  |   |                                   |
|------------------|---|-----------------------------------|
| <b>IN RE:</b>    | ) |                                   |
|                  | ) |                                   |
| TIFFANY N. WICKS | ) | Case No. 09 – 08899               |
|                  | ) |                                   |
|                  | ) | Chapter 13                        |
|                  | ) |                                   |
| DEBTOR(S),       | ) | Honorable Judge Jacqueline P. Cox |

**STATEMENT OF OUTSTANDING OBLIGATIONS**

Now comes Litton Loan Servicing, LP (“Litton”) and files this Statement to the Trustee’s Notice of Payment of Final Mortgage Cure Amount and in support states as follows:

1. On December 2, 2010, Chapter 13 Trustee Tom Vaughn filed a Notice of Payment of Final Mortgage Cure Amount. The Notice was subsequently served on Litton and indicated that if the creditor is not post petition current, it must file a Statement of Outstanding Obligation. This response is being filed pursuant to said Notice and serves as its Statement of Outstanding Obligation. Litton is the servicer for the second mortgage.
2. The Debtor is not current on her post-petition second mortgage payments regarding the real estate located at: 312 Wildwood Drive, Park Forest, Illinois 60466 (“Real Estate”). The plan was confirmed on August 8, 2010.
3. There is a post petition default on the second mortgage, and therefore Litton should not consider the second mortgage fully reinstated.
4. The loan has an outstanding obligation to Litton at the time of the Trustee’s Notice. The following amount is due, and owing post-petition, and serves as the statement of outstanding obligation:

i) The post-petition monthly payment is \$292.88. The post-petition payments include:

A) May, August, September, November December 2009; and

B) January through December 2010.

There are a total of seventeen payments due post-petition at \$292.88.

That the total post petition default totals \$4,978.95 plus \$140.00 in advances for a total of \$5,118.96. The mortgagee should not be required to treat the mortgage as reinstated and fully current. The creditor reserves the right to amend this response and Statement of Outstanding Obligation.

Respectfully submitted,

/s/ Mitchell A. Lieberman  
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